

# EXHIBIT B

First and Second Defendants  
PTF Grayson  
First  
29 July 2020

Claim No: QB-2020-002492

**IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION  
B E T W E E N:**

**STOKOE PARTNERSHIP SOLICITORS**

Claimant

- and -

**(1) MR PATRICK TRISTRAM FINUCANE GRAYSON  
(2) GRAYSON + CO LIMITED  
(3) MR STUART ROBERT PAGE  
(4) PAGE CORPORATE INVESTIGATIONS LIMITED**

Defendants

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**AFFIDAVIT OF  
PATRICK TRISTRAM FINUCANE GRAYSON**

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I, Patrick Tristram Finucane Grayson of 3 Rosenau Crescent, London SW11 4RY **MAKE OATH AND SAY AS FOLLOWS:**

1. I am the First Defendant in this action. I am also a director of the Second Defendant: a company registered in England and Wales with company number 10907649. I make this Affidavit for myself and also on behalf of the Second Defendant by whom I am duly authorised to make this Affidavit.
  
2. I make this Affidavit in order to comply with paragraph A4 of the Consent Order in these proceedings dated 24 July 2020. I adopt in this Affidavit the abbreviations used in the Consent Order.

3. The facts and matters stated in this Affidavit are within my own knowledge and are true.

Paragraph A4 of the Consent Order

4. I set out below in quotation marks the questions in paragraph A4 of the Consent Answer which I then answer. For convenience I have retained the paragraph numbering in paragraph A4. In my answers, as indicated above, I have adopted the definition of "Confidential Information" set out in paragraph A1 of the Consent Order which for convenience I set out here:

*"1.1 'Confidential Information' shall mean any information sourced or derived, in whole or in part, from any document, whether paper or electronic, that has been obtained from the Claimant without its authority and is either designated as confidential, or is evidently confidential by reason of its subject-matter or the manner in which it has been obtained.'*

*1.2 'Confidential Information' shall include, but shall not be limited to: (i) the Claimant's banking records, accounts and statements; (ii) the Claimant's telephone records, accounts and statements; and (iii) documents which have not been published and which, on their face, relate to the conduct of the legal proceedings of Mr Karam Al Sadeq."*

Question

- 4.1 *"the identity of the person who has requested him to obtain Confidential Information from or pertaining to the Claimant, directly or indirectly."*

Answer

- 4.1 Nobody requested me to obtain Confidential Information from or pertaining to the Claimant, directly or indirectly.

Question

4.2     “(i) the manner in which the communication took place, (ii) the gist of the requests made, (iii) whether the requests were in writing, and (iv) if in writing, providing a copy if one exists in the possession or control of the Defendant.”

Answer

4.2     Does not arise in view of my answer to Question 4.1.

Question

4.3     “what, if any, Confidential Information originating from the Claimant was obtained;”

Answer

4.3     I did not obtain any Confidential Information regarding the Claimant.

Question

4.4     “the use, if any, Confidential Information, identifying any person to whom it has been provided and in respect of each person stating: (i) when; (ii) where, and (iii) how the Confidential was provided, and (iv) for what purpose;”

Answer

4.4     Nobody. See 4.3 above.

Question

4.5     “the treatment, if any, of the Confidential Information, identifying any steps taken in relation to its handling, storage, preservation and/or destruction.”

Answer

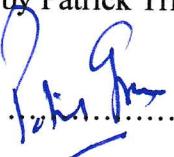
4.5     See Answer 4.3 above.

Conclusion

5.     As is apparent from my answers above, I never asked Mr Robinson to obtain

Confidential Information relating to the Claimant.

SWORN by Patrick Tristram Finucane Grayson

Signed: 

This 29<sup>th</sup> day of July 2020

Acknowledged before me by the above named this 29<sup>th</sup> day of July 2020, he having solemnly averred the truth of the above contents.

Signed: 

Name: SOFIA GALIC

Qualification: SOLICITOR

Address:

Woodstock Solicitors  
First Floor  
32 New Road  
Woodstock  
OX20 1PB

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**AFFIDAVIT OF**

**PATRICK TRISTRAM FINUCANE**

**GRAYSON**

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**Solicitors for the First and**

**Second Defendants**